



February 21, 2014

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, N.Y. 10017-1312

USDC SDNY
DOCUMENT
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DATE FILED: FEB 24 2014

Re: Peterson v. Islamic Republic of Iran, Case No. 1:13-cv-09195-KBF

Dear Judge Forrest:

We represent judgment creditors Elizabeth Murphy, Armando Ybarra, Estate of Terrance Rich, John L'Heureux, Kerry L'Heureux, Jane L'Heureux, Mary Wells, and Bryan Harris (hereinafter "Murphy Judgment Creditors") in Case No. 1:10-cv-04518-KBF, determined to be related on January 10, 2014 [no ECF #] on the docket of this action.

We write to request an enlargement of time, to March 4, 2014, to file a motion for leave to intervene, or other appropriate pleading, to enable the Murphy Judgment Creditors to join in this action as plaintiffs. As the Court is aware, the Murphy Judgment Creditors hold a substantial judgment against the Islamic Republic of Iran which arise out of the same facts and circumstances as the claims of most of the plaintiffs in this action (that they are victims of the 1983 terrorist bombing of the U.S. Marine Barracks in Beirut, Lebanon, and family members of American servicemen killed in that attack, and of survivors).

On behalf of the Murphy Judgment Creditors, a writ of execution was issued on November 6, 2013, and served by the U.S. Marshals Service on Clearstream Banking, S.A., on or after November 22, 2013. Clearstream Banking, S.A., responded, by counsel, on November 27, 2013, that "Clearstream holds no assets of the Islamic Republic of Iran ("Iran"), or any of Iran's agencies or instrumentalities, in the United States." (Exhibit 1 to the attached motion.) Because the precise date of service has not been determined, the Murphy Judgment Creditors are requesting an enlargement of the time in which to assert their claims based on the writ, and Clearstream's response.

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The Murphy Judgment Creditors expected to be named as plaintiffs in this action together with the other judgment creditor groups (Davis, Valore, Arnold, Spence, Bonk, Bland and Brown) who are named on Exhibit A to the complaint. The complaint in this action was filed under seal, and counsel for the Murphy Judgment Creditors only recently learned that, through an oversight, they had not been included.

We respectfully request that the Court grant the requested enlargement, either in the form of an endorsed letter, or by directing that the attached motion be filed, and granting the requested relief by minute order.

Respectfully submitted,

/ s / Steven Barentzen
Steven Barentzen (N.Y. Bar #2770147)
PCT Law Group

Ordered
Application granted. Any
motion to intervene must
be filed not later than
3/4/14.

2/24/14 ← B. J. Jones
 as DJ